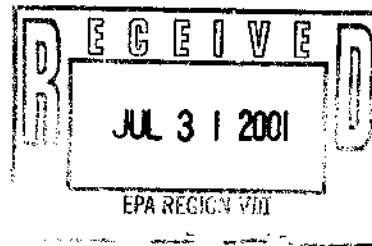


STATE OF COLORADO  
Bill Owens, Governor  
DEPARTMENT OF NATURAL RESOURCES  
**DIVISION OF WILDLIFE**  
AN EQUAL OPPORTUNITY EMPLOYER

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July 25, 2001

Valois Shea  
US Environmental Protection Agency  
Mail Code: 8P-W-GW-UIC  
999 18<sup>th</sup> Street, Suite 300  
Denver, CO 80202-2466

**RE: Additional Information on Foothills Wildlife Lab Class V Permit Application**

In response to your voice mail of July 24, 2001, I would like to submit the following information regarding the lab procedures and the nature of the infectious agents and pathogens under study at the proposed facility.

**Summary of General Lab Procedures**

The following is a general list of typical procedures to be practiced in all laboratory and necropsy areas utilizing the materials identified above. These follow procedures typically described under "standard laboratory precautions" for handling biological materials.

**General Cleaning:**

1. For cleaning all surfaces, first use Inspector's Choice to remove gross debris, rinse thoroughly. Remove excess water and then wipe the surfaces with a 10 % solution of LpH. This disinfectant has been found to inactivate the agent that causes scrapie, and is thought to have the same effect on the CWD agent. LpH is also germicidal, fungicidal, tuberculocidal, and virucidal. Use it to clean all blood and fluid spills.

**Necropsy instruments:**

2. Do not remove any instruments from the lab.
3. Instruments must be used only in the manner for which they are intended.
4. After each individual sampling, instruments should be washed with dish soap then soaked for at least 30 minutes in a 10% solution of LpH. Rinse instruments thoroughly with water before next use. When done for the day, instruments can be left to soak in fresh LpH solution over night.
5. Remove instruments from LpH in the morning and rinse thoroughly with water; leave them to air dry (Remember to leave scissors open so they do not rust). Store instruments properly when dry.
6. LpH should be changed every 24 hours, or after heavy use.

**Cleaning and disinfecting the lab:**

7. When done with all processing for the day, tables, floors, transports and instruments must be properly cleaned and stored. For instruments see above.
8. Begin by spraying Inspector's Choice, via the foamer, on the floors, tables and tilt trucks. Once surfaces are thoroughly coated, allow the Inspector's Choice to work for a few minutes. Use a brush to scrub surfaces and help loosen debris. Rinse thoroughly with clean water.
9. Once clean, tilt trucks can be returned to the designated area in the cooler to dry.

DEPARTMENT OF NATURAL RESOURCES, Greg E. Walcher, Executive Director  
WILDLIFE COMMISSION, Rick Enstrom, Chair • Robert Shoemaker, Vice-Chair • Marianna Raftopoulos, Secretary  
Members, Bernard Black • Tom Burke • Philip James • Brad Phelps • Olive Valdez  
Ex-Officio Members, Greg E. Walcher and Don Ament

10. Use a squeegee to remove excess water from floor to aid drying.
11. Once surfaces are dry, saturate with a 10% solution of LpH. There is a spray bottle with dilution already mixed up. Allow this to sit for at least 30 minutes or let it air dry. Surfaces then can be rinsed with water, but is not necessary.

Cleaning the walk in cooler:

12. Clean up blood and fluids quickly. Use Inspector's Choice as above to clean.
13. Once the floor is dry, spray thoroughly with LpH and allow to air dry.
14. Use drain cleaner as necessary to assist with drainage.

#### **Infectious agents studied under laboratory conditions**

Much of the work conducted in this laboratory facility is related to ongoing studies of chronic wasting disease (CWD), a prion disease of native deer and elk. CWD is endemic in Larimer County, and has been endemic at the Foothills Wildlife Research Facility (FWRF) and adjacent university properties for over 30 years. The known natural host range of CWD is limited to deer (*Odocoileus* spp.) and elk (*Cervus elaphus*). Molecular and experimental studies conducted to date have demonstrated that risk to humans and domestic livestock is exceedingly small, if not zero. Both the World Health Organization and the US Food and Drug Administration's Transmissible Spongiform Encephalopathy Advisory Committee have stated that there is no evidence of CWD transmission to humans. Ongoing research involving the CWD agent at FWRF has already been reviewed and approved by the Colorado State University Biosafety Committee (CSUBC), as have laboratory protocols currently used in existing facilities. Known infectious tissues are handled in accordance with CSUBC-approved protocols, and the amount of infectious agent that may be discharged via the proposed Individual Sewage Disposal System is below the threshold for established detection methods.

Please feel free to contact me at (970) 472-4434 with any further questions.

Sincerely,



Craig Workman  
Project Engineer  
Colorado Division of Wildlife